

# EXHIBIT 6

1 because you need to get a 30(b)(6) and then you need to get  
2 perhaps an owner.

3 MS. SULLIVAN: May I address that then,  
4 Master Esshaki? We actually do need more than one deposition  
5 of the auto-dealer plaintiffs' entities for all the reasons  
6 we already argued, and frank --

7 MASTER ESSHAKI: They are not going to go back  
8 again, it is across all parts.

9 MS. SULLIVAN: Understood, understood. So for now  
10 we are talking about how many, putting aside the duplication  
11 issue, put that aside for now. For now we are talking about  
12 how many can we take? Can we take one or can we take the  
13 three 30(b)(1) depositions and the 18 hours of 30(b)(6)  
14 testimony that you already ruled would be appropriate in the  
15 case?

16 MASTER ESSHAKI: Yes, but that ruling came out  
17 before and --

18 MS. SULLIVAN: That's correct, Your Honor, but the  
19 Court said --

20 MASTER ESSHAKI: As I said, she overturned the  
21 apple cart with that ruling.

22 MS. SULLIVAN: Respectfully we disagree with that.  
23 What she was focused on is whether you take the same  
24 witnesses over and over and over again.

25 MASTER ESSHAKI: No, that's not what I got from it.